



1 WHEREAS, in the above-captioned case:

2 1. A joint Stipulation of Dismissal and Order was entered by the Court on October 6,  
3 2011 (Doc. 49).

4 2. In the Stipulation of Dismissal and Order, the Plaintiffs and Defendants agreed that,  
5 notwithstanding dismissal of this action, the Court retains jurisdiction to consider a further  
6 stipulation or motion concerning an award of attorneys' fees and costs. Doc. 49 at 2.

7 3. In the Stipulation of Dismissal and Order, the Plaintiffs and Defendants also stated  
8 that they would attempt to reach agreement as to recovery of attorneys' fees and costs and, absent  
9 such agreement, that Plaintiffs would file an application with the Court for the recovery of fees and  
10 costs within 60 days of the approval of the Order by the Court. Doc. 49 at 2.

11 4. On December 5, 2011, the Court granted a stipulated request by the Parties and  
12 extended the deadline for Plaintiffs to file an application for recovery of fees and costs until  
13 February 3, 2012. Doc. 51.

14 5. Plaintiffs and Defendants have exchanged proposals for settlement of attorneys' fees  
15 and costs, and at the staff level have reached an agreement in principle as to an amount for such  
16 settlement, pending approval by relevant officials at the Department of Justice and Department of  
17 the Interior. The Parties seek additional time to attempt to finalize this agreement without  
18 unnecessarily burdening the Court with briefing and argument on this matter.

19 6. Accordingly, pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs and Defendants  
20 hereby stipulate and request that the Court extend for 30 days (until March 5, 2012) the time for any  
21 motion concerning an award of attorneys' fees and costs.

22  
23 DATED: January 26, 2012

Respectfully submitted,

24  
25 /s/ George M. Torgun (with permission)  
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16 Attorneys for Federal Defendants  
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1  
2 [PROPOSED] ORDER  
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PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED: Jan. 26, 2012



## **CERTIFICATE OF SERVICE**

I hereby certify that on this 26th day of January, 2012, I caused a copy of the foregoing to be served on the counsel of record by means of the Court's electronic filing system:

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/s/ Daniel Pollak  
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